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October 19, 2018

Chambers, Hon. Elizabeth S. Stong
United States Bankruptcy Court
Eastern District of New York
271-C Cadman Plaza East
Brooklyn, NY 11201

Re: Sean M Murray
Case No. 17-44157-ess
Loan No. ...9508

Dear Judge Stong:

This writer represents Specialized Loan Servicing, LP (SLS) and Gross Polowy, LLC and its employees in the above-captioned bankruptcy case.

Based on interactions with the Pro-Se Debtor Sean M. Murray (Mr. Murray), we are pleased to report that a settlement in principle has been reached between Mr. Murray, SLS, Gross Polowy, LLC and its employees in relation to the pending litigation before the Court. The settlement is confidential in substance and requires the entry of the proposed stipulation and order attached hereto as **Exhibit A**.

The parties request that the court review Exhibit A and confirm it meets with the Court's approval. Upon such confirmation, the parties shall execute the same and submit the same for approval and finalize the confidential settlement.

Very truly yours,
Gross Polowy, LLC

By: *S/Dennis Jose, Esq.*

cc. Sean M Murray (Via Mail and Email)

Exhibit A

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

X

In re:

Sean M. Murray

Case No. 13-42618 (ESS)

Chapter 7

Debtor.

X

**STIPULATION AND ORDER WITHDRAWING APPLICATIONS FOR ORDERS TO
SHOW CAUSE AS TO GROSS POLOWY, LLC, ATTORNEYS ASSOCIATED WITH
GROSS POLOWY, LLC AND SPECIALIZED LOAN SERVICING, LLC**

WHEREAS, on August 10, 2017 the Debtor Sean M. Murray (the “**Debtor**”) instituted this Chapter 7 case (the “**Bankruptcy Case**”) via the filing of a petition (ECF Docket No. 1);

WHEREAS, on December 8, 2017 Debtor received a discharge (ECF Docket No. 8), and

WHEREAS, the **Debtor** having filed the following motions seeking the entry of Orders to Show Cause:

Docket No. 43: Application for an Order to Show Cause

Docket No. 67: Application for and Order to Show Cause

Docket No. 74: Application for an Order to Show Cause

and the above motions shall henceforth be collectively known as **Motions for Orders to Show Cause**, and

WHEREAS, the **Debtor**, Gross Polowy, LLC, and Specialized Loan Servicing, LLC have engaged in good faith settlement discussions to resolve the **Motions for Orders to Show Cause**, and

WHEREAS, the **Debtor**, Gross Polowy, LLC, Specialized Loan Servicing, LLC have contemporaneously herewith entered into a confidential settlement agreement (the “**Settlement Agreement**”), resolving the **Motions for Orders to Show Cause**, the effectiveness of which is subject to this Court approving this stipulation; and

WHEREAS, the **Settlement Agreement** provides, among other things, for the filing of this stipulation withdrawing the **Motions for Orders to Show Cause** as to Gross Polowy, LLC, attorneys associated with Gross Polowy, LLC and Specialized Loan Servicing, LLC with prejudice

NOW, THEREFORE, IT IS HEREBY STIPULATED, AGREED AND ORDERED THAT:

1. This Court has jurisdiction over these proceedings and the parties hereto pursuant to 28 U.S.C. §§ 157 and 1334 and this Court shall retain jurisdiction to enforce the terms of this stipulation and order and any agreement executed in connection therewith.
2. None of the parties hereto admit any fault or wrongdoing in connection with the **Motions for Orders to Show Cause** or the factual allegations or legal issues raised therein, and nothing herein shall be construed as an admission of any liability, wrongdoing, or merits of any claims or defenses asserted with respect thereto.
3. The terms of the **Settlement Agreement** shall not be disclosed, reproduced, published or disseminated for any purpose and shall be kept confidential by the parties.
4. The **Motions for Orders to Show Cause** are hereby withdrawn with prejudice as they relate to Gross Polowy, LLC, all attorneys associated with Gross Polowy, LLC including but not limited to Dennis Jose, Esq., Deborah Turofsky, Esq., Ehret Van-Horn, Esq., and Specialized Loan Servicing, LLC

Sean M. Murray, Debtor

By Sean M. Murray

Dated _____

Gross Polowy, LLC as counsel to Gross Polowy, LLC and all its associated attorneys and Specialized Loan Services, LLC

By Dennis Jose, Esq.
Gross Polowy, LLC
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